



Air Pollution Control District San Luis Obispo County

August 22, 2013

Brian Pedrotti
San Luis Obispo County Department of Planning & Building
County Government Center
San Luis Obispo CA 93401

SUBJECT: APCD Comments Regarding the Laetitia Cluster Tract 2606 & CUP 2004-0001, RDEIR Environmental Impact Report. (CUP 2004-0001, Tract 2606)

Dear Mr. Pedrotti,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the proposed project located at 453 Laetitia Vineyard Drive in Arroyo Grande.

The Revised Recirculated Draft EIR consists of several revised sections of the 2008 DEIR including water resources, biological resources, and alternative analysis and along with the 2008 DEIR, addresses the environmental impacts that may be associated with an Agricultural Cluster subdivision of twenty-one parcels into 106 lots, including 102 residential lots and four open space lots. Approximately 113 acres of existing vineyard would be removed to accommodate proposed development and buffer zones. Approximately 140 acres of replacement vineyard would be replanted onsite. Development proposed within the open space lots includes a homeowner's association facility, recreation center, and community center (ranch headquarters). The proposed project would be developed in three phases. In addition to these three phases, the applicant purposes a 7.7 acre dude ranch within one of the open space lots.

The following are APCD comments that are pertinent to this project.

GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each.

On December 2, 2008 the SLOAPCD submitted comments on the DEIR dated September 2008. Additional comments were submitted on June 5, 2012 when the EIR was recirculated (April 2012).

In both letters, numerous items were mentioned that needed further evaluation including but not limited to greenhouse gases (GHGs) emission evaluation. SLOAPCD staff recommends, prior to finalizing the EIR, the comments contained in our previous two letters (copies attached) be addressed, as well as the comments included below.

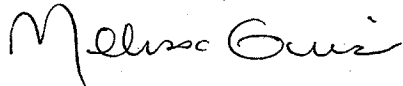
Page VI-2, Alternative Selection

As indicated in previous letters, both the construction and operation emissions associated with the project appear to be underestimated. As previously recommended, these items need to be addressed to be able to fully assess the air quality impacts from this project. On page VI-5, Table VI-2 of the RRDEIR indicates the applicant's proposed project description changes would reduce AQ impact 6 from a Class I to a Class II impact. Mitigation both on and off-site will be required to reduce the impacts from Class I to Class II.

Based on a preliminary evaluation conducted by the SLOAPCD, the project's operational and construction emissions would exceed the District's thresholds. Due to the transportation related emissions associated with this type of development, it will be very difficult to reduce the operational phase emissions to levels below the SLOAPCD thresholds. Also, as indicated in our letter dated June 5, 2012, due to the rural location of this project the SLOAPCD recommends the trip distance default be 13 miles for all categories of trips. As indicated in the September 2008 DEIR, mitigation measures AQ/mm-13 operational phase emission over the APCD Tier II threshold will need to be mitigated using off-site mitigation. The applicant will need to work with the APCD to define and implement off-site mitigation which would apply to both criteria pollutants and GHGs.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-4667.

Sincerely,



Melissa Guise
Air Quality Specialist

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